

EXHIBIT B

**MARYLAND**

401 Bosley Avenue, P.O. Box 6754
Towson, MD 21285-6754

To: FIRST CAPITAL REAL ESTATE TRUST, INC.
C/O GARY JONES, ESQ.
BAXTER, BAKER, SIDLE, CONN & JONES P.A.
191 MAIN STREET
ANNAPOLIS, MD 21401

Case Number:**C-03-CV-22-003063****Other Reference Number(s):****Child Support Enforcement Number:****FIRST CAPITAL BORROWER, LLC VS. FIRST CAPITAL REAL ESTATE TRUST, INC.**

Issue Date: 8/3/2022

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 30 days after service of this summons upon you, in this court, to the attached complaint filed by:

FIRST CAPITAL BORROWER, LLC
c/o Adam M Kaplan, Esq
Stradley Ronon Stevens & Young, LLP
2000 K Steet, NW, Suite 700
Washington, DC 20006

This summons is effective for service only if served within 60 days after the date it is issued.

Julie L. Ensor
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued. If it is not served within the 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

SHERIFF'S RETURN
(please print)

To: FIRST CAPITAL REAL ESTATE TRUST, INC.

_____ ID# _____ of the _____
Serving Sheriff's Name

County Sheriff's office present to the court that I:

(1) Served _____
Name of person served
on _____ at _____
Date of service Location of service
by _____ with the following:
Manner of service

- | | |
|--|---|
| <input type="checkbox"/> Summons | <input type="checkbox"/> Counter-Complaint |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Domestic Case Information Report |
| <input type="checkbox"/> Motions | <input type="checkbox"/> Financial Statement |
| <input type="checkbox"/> Petition and Show Cause Order | <input type="checkbox"/> Interrogatories |
| <input type="checkbox"/> Other _____ | |
| Please specify | |

(2) Was unable to serve because:

- | | |
|---|--|
| <input type="checkbox"/> Moved left no forwarding address | <input type="checkbox"/> No such address |
| <input type="checkbox"/> Address not in jurisdiction | <input type="checkbox"/> Other _____ |

Please specify

Sheriff fee: \$ _____ ☐ waived by _____

Date

Signature of serving Sheriff

Instructions to Sheriff's Office or Private Process Server:

1. This Summons is effective for service only if served within 60 days after the date issued. If it is not served within 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Rule 2-126.
4. If this summons is served by private process, process server shall file a separate affidavit as required by Rule 2-126(a).

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

FIRST CAPITAL BORROWER, LLC
c/o Adam M. Kaplan, Esq.
Stradley Ronon Stevens & Young, LLP
2000 K Street, NW, Suite 700
Washington, DC 20006

Petitioner,

v.

FIRST CAPITAL REAL ESTATE TRUST, INC.
c/o Gary Jones, Esq.
Baxter, Baker, Sidle, Conn & Jones, P.A.
191 Main Street
Annapolis, MD 21401

Respondent.

C-03-CV-22-003063

Case No. _____

**PETITION FOR COURT SUPERVISED DISSOLUTION AND LIQUIDATION
OF FIRST CAPITAL REAL ESTATE TRUST, INCORPORATED**

Petitioner, First Capital Borrower, LLC, by its undersigned counsel and Stradley Ronon, Stevens, & Young, LLP, pursuant to Md. Code Ann., Corps. & Ass'ns. § 3-516, § 3-413(b), and § 3-414, respectfully submit this Petition for the Court supervised dissolution and liquidation of First Capital Real Estate Trust, Inc. In support thereof, Petitioner states as follows:

THE PARTIES

1. Petitioner is First Capital Borrower, LLC ("Petitioner" or "First Capital"), a Delaware limited liability company whose registered agent, A Registered Agent, Inc., is located at 8 the Green, Suite A, Dover, Delaware 19901.

2. Respondent is First Capital Real Estate Trust, Incorporated ("Respondent" or "FC RET"), a Maryland corporation with a principal office located at VCORP Services MD, Inc., 2405 York Road, Suite 201, Lutherville-Timonium, MD 21093-2264.

3. Petitioner is a stockholder of Respondent and is entitled to vote in the election of Respondent's directors.

JURISDICTION AND VENUE

4. This Court has personal jurisdiction over Respondent pursuant to MD. Code Ann., Courts and Judicial Proceedings, § 6-102 because it is a Maryland corporation and it maintains its principal place of business within the State of Maryland.

5. Venue is appropriate in this Court pursuant to MD Code, Courts and Judicial Proceedings, § 6-201 because Respondent's principal office location, as listed with the Maryland State Department of Assessments & Taxation (MD SDAT), is located in Baltimore County, Maryland.

FACTUAL BACKGROUND

6. Since 2019, Respondent has not held any annual meetings or elections, has not produced any accountings or audits for shareholder review or inspection, has not made any shareholder distributions of any kind, and has not responded to shareholder inquiries or demands.

7. On October 15, 2021, MD SDAT issued a proclamation forfeiting Respondent's charter following its failure to file a property tax return for 2020.

8. Pursuant to Md. Code Ann., Corps. & Ass'ns. § 3-503(d), upon issuance of the proclamation, "the charters of the corporation are repealed, annulled, and forfeited, and the powers conferred by law on the corporations are inoperative, null, and void as of the date of the proclamation, without proceedings of any kind either at law or in equity."

9. Accordingly, Respondent is a forfeited corporation whose charter has been repealed and whose legal powers have been declared inoperative by MD SDAT and applicable law. As such, Respondent and its purported directors, officers, and agents have no legal authority to act, including to intervene into litigation, except for the limited purpose of liquidation or winding up

the corporation. In fact, legal filings made by the forfeited corporation are a nullity. *Dual Inc. v. Lockheed Martin Corp.*, 383 Md. 151, 163 (2004).

10. Md. Code Ann., Corps. & Ass'ns. § 3-514 makes it a misdemeanor for a person to transact business in the name of a corporation knowing it has been forfeited. This Section also imposes a presumption of knowledge of the forfeited corporate status on any person who was an officer or director of the corporation at the time of the forfeiture unless there is clear evidence to the contrary.

11. Despite notice of Respondent's forfeited status, Respondent, through its purported agent, Frank Forelle, and legal counsel associated with Mr. Forelle, has persisted in various activities purportedly for Respondent including seeking to intervene in litigation on behalf of Respondent. Mr. Forelle, the putative Chief Executive Officer of Respondent, has actual notice of Respondent's forfeited status from various correspondence, in addition to the statutory notice sent by MD SDAT to Respondent prior to the forfeiture, as well as filings in lawsuits that noted Respondent's forfeited status.

12. Mr. Forelle and others associated with corporation, including its directors, Frank Grant and Richard Leider, had actual knowledge of the forfeited corporate status before Respondent undertook various actions in litigation and otherwise.

13. Upon information and belief, Respondent has no registered agent and no corporate officers other than those identified in the preceding paragraphs.

14. In light of its forfeited status, Respondent's actions, which were performed at the direction of Mr. Forelle, Frank Grant, and Richard Leider, including seeking to intervene in litigation, are illegal.

15. It is further believed that Respondent's actions may have been done in collaboration with agents of FTE Networks, Inc. to subvert the interests of Petitioner and Respondent's other stockholders. The managers of FTE Networks, Inc. have embroiled that corporation in various litigation designed to maintain control over the company and are believed to have usurped Mr. Forelle to engage Respondent in that litigation and to intercept and convert certain assets intended to be distributed directly to Respondent's shareholders.

16. Upon information and belief, Respondent has illegally or fraudulently allowed another entity to take title to and/or equity in an asset of Respondent, a medical complex located at 945 82nd Parkway, Myrtle Beach, South Carolina 29572 (the "Medical Complex"). The loss of equity in the Medical Complex is prejudicial to Petitioner and wrongfully deprives Petitioner of the value of its rightful interest in the Medical Complex.

17. In addition, certain activities of Respondent are suspicious and should be investigated, including its interests in real estate and transactions relating to that real estate, as well as the dissipation of its cash on hand. Such investigation may lead to additional claims against persons involved with Respondent's operations. An accounting of Respondent's financial transactions including its expenses paid and disposition of assets, must be obtained pursuant to the investigation.

18. Under the circumstances, Respondent must be dissolved and/or liquidated and its putative officers, directors and agents enjoined from further action in the interim.

COUNT I
Court Supervised Liquidation under § 3-516

19. Petitioner incorporates all earlier allegations as if re-alleged herein.

20. Pursuant to Md. Code Ann., Corps. & Ass'ns. § 3-516, a stockholder of a Maryland corporation that has had its charter forfeited may petition a court of equity to take jurisdiction of

the liquidation of the corporation and, for good cause shown, may order the corporation liquidated under court supervision.

21. As explained above, Petitioner is a stockholder of a Maryland corporation, Respondent, whose charter has been forfeited.

22. Accordingly, for the good cause stated above, Petitioner requests that the Court take jurisdiction over Respondent's liquidation and enter an order requiring the court supervised liquidation of Respondent.

COUNT II

Court Supervised Dissolution and Liquidation under §§ 3-413(b)(2) and 3-414

23. Petitioner incorporates all earlier allegations as if re-alleged herein.

24. In the alternative, Md. Code Ann., Corps. & Ass'ns. § 3-413(b)(2) permits any stockholder entitled to vote in the election of directors of a corporation to petition a court of equity to dissolve the corporation on grounds that the acts of the directors or those in control of the corporation are illegal, oppressive, or fraudulent.

25. In turn, § 3-414 permits the Court, upon petition of a stockholder as identified in § 3-413(b)(2), to dissolve and liquidate a corporation under the Court's supervision.

26. Here, Petitioner is a stockholder entitled to vote in the election of Respondent's directors.

27. Accordingly, for the good cause stated above, Petitioner requests that the Court take jurisdiction over Respondent because of the illegal, oppressive, and/or fraudulent acts of those in control of Respondent and enter an order for dissolution, liquidation, and such other relief as the Court deems proper pursuant to Md. Code Ann., Corps. & Ass'ns. § 3-414.

WHEREFORE, Petitioner requests the Court order the following:

a) Court supervised dissolution and liquidation of Respondent,

- b) Upon filing of a motion under Rule 13-104(b), issuance of a Show Cause Order, and a hearing for the appointment of a receiver pursuant to Md. Code Ann., Corps. & Ass'ns. § 3-418 with the powers to set aside any preference, payment, or transfer made by Respondent that would be void, voidable, or fraudulent under Maryland law or the federal Bankruptcy Code,
- c) Enjoinment of its putative officers, directors, and agents, and advisors from action purportedly on behalf of Respondent in the interim,
- d) Investigation of the financial transactions of Respondent through discovery proceedings, including of its expenses paid and disposition of assets, resulting in an accounting.
- e) Such other and further relief as this Court deems appropriate.

Respectfully submitted,

/s/ Adam M. Kaplan

Adam M. Kaplan, Esq. (CPF # 0812170124)
Stradley Ronon Stevens & Young, LLP
2000 K Street, NW, Suite 700
Washington, DC 20006
(202) 507-5155 (T)
akaplan@stradley.com

Andrew K. Stutzman, Esq. (CFP # 1106130008)
Stradley Ronon Stevens & Young, LLP
2005 Market Street, Suite 2600
Philadelphia, PA 19103
(215) 564-8008 (T)
astutzman@stradley.com

Counsel for First Capital Borrower, LLC

ATTORNEY CERTIFICATION OF ADMISSION

Pursuant to Maryland 1-313, I hereby certify that I am a member of the Maryland Bar and am authorized to practice law in the state of Maryland.

/s/ Adam M. Kaplan

Adam M. Kaplan

IN THE CIRCUIT COURT FOR Baltimore County

(City or County)

CIVIL – NON-DOMESTIC CASE INFORMATION SHEET

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING C-03-CV-22-003063

FORM FILED BY: ☒ PLAINTIFF ☐ DEFENDANT **CASE NUMBER** _____ (Clerk to insert)

CASE NAME: FIRST CAPITAL BORROWER, LLC vs. FIRST CAPITAL REAL ESTATE TRUST

PARTY'S NAME: FIRST CAPITAL REAL ESTATE TRUST, INC. **PHONE:** 202-507-5155

PARTY'S ADDRESS: c/o Stradley Ronon, 2000 K Street, NW, Suite 700, Washington, DC 20006

PARTY'S E-MAIL: akaplan@stradley.com

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Adam M. Kaplan **PHONE:** 202-507-5155

PARTY'S ATTORNEY'S ADDRESS: 2000 K Street, NW, Suite 700, Washington DC 20006

PARTY'S ATTORNEY'S E-MAIL: akaplan@stradley.com

JURY DEMAND? ☐ Yes ☒ No

RELATED CASE PENDING? ☐ Yes ☒ No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: _____ hours 1 days

PLEADING TYPE

New Case: ☒ Original ☐ Administrative Appeal ☐ Appeal

Existing Case: ☐ Post-Judgment ☐ Amendment

If filing in an existing case, skip Case Category/ Subcategory section – go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

TORTS

- ☐ Asbestos
- ☐ Assault and Battery
- ☐ Business and Commercial
- ☐ Conspiracy
- ☐ Conversion
- ☐ Defamation
- ☐ False Arrest/Imprisonment
- ☐ Fraud
- ☐ Lead Paint – DOB of Youngest Plt: _____
- ☐ Loss of Consortium
- ☐ Malicious Prosecution
- ☐ Malpractice-Medical
- ☐ Malpractice-Professional
- ☐ Misrepresentation
- ☐ Motor Tort
- ☐ Negligence
- ☐ Nuisance
- ☐ Premises Liability
- ☐ Product Liability
- ☐ Specific Performance
- ☐ Toxic Tort
- ☐ Trespass
- ☐ Wrongful Death

CONTRACT

- ☐ Asbestos
- ☐ Breach
- ☐ Business and Commercial
- ☐ Confessed Judgment (Cont'd)
- ☐ Construction
- ☐ Debt
- ☐ Fraud

- ☐ Government
- ☐ Insurance
- ☐ Product Liability

PROPERTY

- ☐ Adverse Possession
- ☐ Breach of Lease
- ☐ Detinue
- ☐ Distress/Distrain
- ☐ Ejectment
- ☐ Forcible Entry/Detainer
- ☐ Foreclosure
 - ☐ Commercial
 - ☐ Residential
 - ☐ Currency or Vehicle
 - ☐ Deed of Trust
 - ☐ Land Installments
 - ☐ Lien
 - ☐ Mortgage
 - ☐ Right of Redemption
 - ☐ Statement Condo
- ☐ Forfeiture of Property / Personal Item
- ☐ Fraudulent Conveyance
- ☐ Landlord-Tenant
- ☐ Lis Pendens
- ☐ Mechanic's Lien
- ☐ Ownership
- ☐ Partition/Sale in Lieu
- ☐ Quiet Title
- ☐ Rent Escrow
- ☐ Return of Seized Property
- ☐ Right of Redemption
- ☐ Tenant Holding Over

PUBLIC LAW

- ☐ Attorney Grievance
- ☐ Bond Forfeiture Remission
- ☐ Civil Rights
- ☐ County/Mncpl Code/Ord
- ☐ Election Law
- ☐ Eminent Domain/Condemn.
- ☐ Environment
- ☐ Error Coram Nobis
- ☐ Habeas Corpus
- ☐ Mandamus
- ☐ Prisoner Rights
- ☐ Public Info. Act Records
- ☐ Quarantine/Isolation
- ☐ Writ of Certiorari

EMPLOYMENT

- ☐ ADA
- ☐ Conspiracy
- ☐ EEO/HR
- ☐ FLSA
- ☐ FMLA
- ☐ Worker's Compensation
- ☐ Wrongful Termination

INDEPENDENT PROCEEDINGS

- ☐ Assumption of Jurisdiction
- ☐ Authorized Sale
- ☐ Attorney Appointment
- ☐ Body Attachment Issuance
- ☐ Commission Issuance

- ☐ Constructive Trust
- ☐ Contempt
- ☐ Deposition Notice
- ☐ Dist Ct Mtn Appeal
- ☐ Financial
- ☐ Grand Jury/Petit Jury
- ☒ Miscellaneous
- ☐ Perpetuate
- ☐ Testimony/Evidence
- ☐ Prod. of Documents Req.
- ☐ Receivership
- ☐ Sentence Transfer
- ☐ Set Aside Deed
- ☐ Special Adm. – Atty
- ☐ Subpoena Issue/Quash
- ☐ Trust Established
- ☐ Trustee Substitution/Removal
- ☐ Witness Appearance-Compel

PEACE ORDER

- ☐ Peace Order

EQUITY

- ☐ Declaratory Judgment
- ☐ Equitable Relief
- ☐ Injunctive Relief
- ☐ Mandamus

OTHER

- ☐ Accounting
- ☐ Friendly Suit
- ☐ Grantor in Possession
- ☐ Maryland Insurance Administration
- ☐ Miscellaneous
- ☐ Specific Transaction
- ☐ Structured Settlements

IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Financial Exploitation | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- ☐ Liability is conceded. ☐ Liability is not conceded, but is not seriously in dispute. ☐ Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- ☐ Under \$10,000 ☐ \$10,000 - \$30,000 ☐ \$30,000 - \$100,000 ☐ Over \$100,000
- ☐ Medical Bills \$ _____ ☐ Wage Loss \$ _____ ☐ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- A. Mediation ☐ Yes ☒ No C. Settlement Conference ☐ Yes ☒ No
 B. Arbitration ☐ Yes ☒ No D. Neutral Evaluation ☐ Yes ☒ No

SPECIAL REQUIREMENTS

- ☐ If a Spoken Language Interpreter is needed, **check here and attach form CC-DC-041**
- ☐ If you require an accommodation for a disability under the Americans with Disabilities Act, **check here and attach form CC-DC-049**

ESTIMATED LENGTH OF TRIAL

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

(Case will be tracked accordingly)

- ☐ 1/2 day of trial or less ☐ 3 days of trial time
☒ 1 day of trial time ☐ More than 3 days of trial time
☐ 2 days of trial time

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- ☐ **Expedited** - Trial within 7 months of Defendant's response ☐ **Standard** - Trial within 18 months of Defendant's response

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under
Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

☐ **Expedited** - Trial within 7 months of
Defendant's response

☐ **Standard** - Trial within 18 months of
Defendant's response

***IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY,
PLEASE FILL OUT THE APPROPRIATE BOX BELOW.***

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- | | |
|---|---|
| <input type="checkbox"/> Expedited | Trial 60 to 120 days from notice. Non-jury matters. |
| <input checked="" type="checkbox"/> Civil-Short | Trial 210 days from first answer. |
| <input type="checkbox"/> Civil-Standard | Trial 360 days from first answer. |
| <input type="checkbox"/> Custom | Scheduling order entered by individual judge. |
| <input type="checkbox"/> Asbestos | Special scheduling order. |
| <input type="checkbox"/> Lead Paint | Fill in: Birth Date of youngest plaintiff_____. |
| <input type="checkbox"/> Tax Sale Foreclosures | Special scheduling order. |
| <input type="checkbox"/> Mortgage Foreclosures | No scheduling order. |

CIRCUIT COURT FOR BALTIMORE COUNTY

- | | |
|---|---|
| <input type="checkbox"/> Expedited
(Trial Date-90 days) | Attachment Before Judgment, Declaratory Judgment (Simple),
Administrative Appeals, District Court Appeals and Jury Trial Prayers,
Guardianship, Injunction, Mandamus. |
| <input checked="" type="checkbox"/> Standard
(Trial Date-240 days) | Condemnation, Confessed Judgments (Vacated), Contract, Employment Related
Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other
Personal Injury, Workers' Compensation Cases. |
| <input type="checkbox"/> Extended Standard
(Trial Date-345 days) | Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or
Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and
out-of-state witnesses (parties), and trial of five or more days), State Insolvency. |
| <input type="checkbox"/> Complex
(Trial Date-450 days) | Class Actions, Designated Toxic Tort, Major Construction Contracts, Major
Product Liabilities, Other Complex Cases. |

August 3, 2022 _____
Date

/s/ Adam M. Kaplan _____ 0812170124
Signature of Counsel / Party Attorney Number

2000 K Street, NW, Suite 700 _____
Address

Adam M. Kaplan _____
Printed Name

Washington _____ DC _____ 20006 _____
City State Zip Code